

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:) Bankruptcy No. 15-21404 CMB
Harry Pearsol and)
Sylvia Pearsol,) Chapter 13
Debtors,)
U.S. Bank National Associates, as Indenture) Related to Claim No. 4
Trustee for Springleaf Mortgage Loan Trust)
2013-1,) Document No.
Movant,)
vs.)
Harry Pearsol, Sylvia Pearsol, and)
Ronda J. Winnecour, Chapter 13 Trustee,)
Respondents.)

DECLARATION THAT THE EXISTING CHAPTER 13 PLAN IS SUFFICIENT

AND NOW, come the Debtors by and through their attorneys, CALAIARO VALENCIK and David Z. Valencik, and presents the following:

1. This case was originally filed on April 23, 2015.
2. U.S. Bank, N.A. filed a Proof of Claim on September 21, 2015, at Claim No. 4.
3. On April 4, 2017 this Court entered an Order Approving a Permanent Loan Modification.
4. On February 28, 2018 US Bank, N.A. filed a notice of mortgage payment change.
5. The net change is approximately \$4.00 per month.
6. The Debtor's current plan is sufficient to pay this payment change.

7. There is no reason to amend Debtor's Chapter 13 Plan.

Respectfully submitted,

DATED: February 28, 2018

BY: /s/ David Z. Valencik
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CERTIFICATE OF SERVICE OF Declaration that the Existing Chapter 13 Plan is Sufficient

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on April 25, 2016.

Service by First Class Mail:

Mr. and Mrs. Harry Pearsol, P.O. Box 86, 423 First Street, West Elizabeth, PA 15088

Patricia Ledgister, Esquire, Aldridge Pite, LLP, Fifteen Piedmont Center, 3575 Piedmont Road, N.E., Suite 500, Atlanta, GA 30305

Service by NEF:

Office of the U.S. Trustee, 1001 Liberty Avenue, Suite #970, Liberty Center, Pittsburgh, PA 15222

Ronda J. Winnecour, Chapter 13 Trustee receives service electronically through the CM/ECF System at cmecf@chapter13trusteewdpa.com (Service by Electronic Notification)

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: First-Class Mail and Electronic Notification.

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the names and addresses of parties served by electronic notice will be listed under the heading "Service by Electronic Notification," and those served by mail will be listed under the heading "Service by First-Class Mail."

EXECUTED ON: February 28, 2018

/s/ David Z. Valencik
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